

5:20mj1215

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR ARREST WARRANT**

**INTRODUCTION**

I, Bryan J. Allen, a Task Force Officer with the Federal Bureau of Investigation (FBI), Cleveland Division, being duly sworn, depose and state as follows:

1. I have been employed as a Canton Police Officer for approximately twenty-four years, and am currently assigned to the Cleveland Division, Canton Resident Agency's Child Exploitation Task Force. While employed by the Canton Police Department and assigned to the FBI, I have assisted in the investigation of federal criminal violations related to Violent Crimes and the FBI's Innocent Images National Initiative, which investigates matters involving the online sexual exploitation of children. I have gained experience through training at the FBI's Innocent Images National Initiative training center and everyday work related to conducting these types of investigations.
2. As a task force officer having received a Special Deputization from the United States Marshal's Office, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.
3. Based on my training and experience and the facts as set forth in this affidavit, there is probable cause to believe that violations of Title 18 Sections 2251(a) and 2252(a) have been committed by **William Aaron Doty Jr.** also known as "d.beas22" and "**Aaron Doty**".

RELEVANT STATUTES

4. There is probable cause to believe **William Aaron Doty Jr.** committed violations of Title 18, United States Code, §§ 2251(a) and 2252(a), relating to material involving the sexual exploitation of minors.
  - a. Title 18, United States Code Section 2251(a) prohibits a person from using, persuading, inducing, enticing or coercing a minor to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct and the depictions were produced using materials that had been shipped or transported in or affecting interstate or foreign commerce.
  - b. Title 18, United States Code, Section 2252(a) prohibits a person from knowingly transporting, shipping, receiving, distributing, reproducing for distribution, or possessing any visual depiction of a minor engaging in sexually explicit conduct when such visual depiction was either mailed or, using any means or facility of interstate or foreign commerce, shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, or when such child pornography was produced using materials that had traveled in interstate or foreign commerce.

#### **BACKGROUND OF THE INVESTIGATION AND PROBABLE CAUSE**

5. On June 1, 2020, affiant received CyberTip 71123057 from the Ohio Internet Crimes Against Children (ICAC) Task Force which had been provided to them by the National Center for Missing and Exploited Children (NCMEC). The CyberTip originated from Instagram<sup>1</sup>.

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<sup>1</sup> Instagram is a free social networking mobile application ("app") that can be downloaded to iOS (for Apple products) and Android operating systems (for multiple other products). The Instagram app can be downloaded to mobile devices (cell phones, tablets, etc) and allows users to communicate via text message and to send photographs and videos using wireless service

6. The CyberTip alleges that between July 2018 and March 2020, a subject using username "*d.beas22*" communicated via Instagram with four victims under the age of 12 and stated in conversations that he wanted to engage in genital to genital intercourse and oral to genital intercourse. According to the CyberTip from Instagram, *d.beas22* also attempted to solicit images depicting child sex abuse material. Instagram provided NCMEC with excerpts of those conversations, which Affiant has summarized as follows:
7. Between July 13, 2018 and December 8, 2018, *d.beas22* communicated with Minor Victim #1. During the conversation *d.beas22* asked "Can I see u in the shower tomorrow lol". Subject *d.beas22* also solicited "nude" photographs from Minor Victim #1, who indicated she was under 12 years of age. Minor Victim #1 sent one image that depicted a prepubescent female nude from the waist down with her legs crossed and her vagina exposed. Subject *d.beas22* also inquired as to when the female would be 12 or 13 and stated "I want to have sex with you".
8. Between November 4, 2019 and March 17, 2020, *d.beas22* communicated with Minor Victim #2 after the female stated she was 10 years of age. During the course of the conversation Minor Victim #2 advised *d.beas22* that she was actually 11 years old. After being advised of the female's age, *d.beas22* asked "Will you do a strip video for me?" Subject *d.beas22* later instructed the minor to "Fuck that pussy with your brush". Thereafter, Minor Victim #2 sent two videos to *d.beas22* that

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provided by telephone service providers (Verizon, AT&T, etc) or WiFi (typically obtained through internet service providers such as Time Warner Cable). Instagram is owned by Facebook and is headquartered in California.

Instagram categorized as “child exploitative”. Subject *d.beas22* then stated “I wish I was that brush”.

- a. The first referenced video was recorded from the floor and depicts a partially nude prepubescent female with a hairbrush in her hands. The female’s legs are spread shoulder length apart exposing her vagina.
  - b. The second referenced video was recorded from the floor and depicts a partially nude prepubescent female engaging in masturbation.
9. On December 7, 2019, *d.beas22* communicated with Minor #3. Subject *d.beas22* stated “Hi what is the naughtiest thing you have ever done” and “I love naughty girls”. Subject *d.beas22* then asked “How old r u I forget”. Minor #3 said “8”. Subject *d.beas22* later stated “I wanna see u naked” and “Cuz ur hot and I really like you”.
10. On December 22, 2019, *d.beas22* communicated with Minor #4. During the conversation Minor #4 stated she was 11 years-old and *d.beas22* falsely stated he was 15 years-old. Subject *d.beas22* asked Minor #4 how old her sisters were and she responded: “they r 8 5 and 3”. During the course of the conversation *d.beas22* stated: “I did it with an 11 year old before” and asked “Have you ever put anything in you pussy before”. Subject *d.beas22* further stated “U can just use your finger lol” and “You could let me lick you”.

11. The CyberTip from Instagram further indicated that a second account labeled “**Aaron Doty**” (User ID 187800927) was linked by machine cookies<sup>2</sup>, mobile devices and IP addresses to the *d.beas22* account (User ID 257324731).
12. On March 5, 2020, **DOTY** using the *d.beas22* account logged in at 17:13:27 PDT from IP address 184.59.187.149. Investigator Beth Crano from the ICAC Task Force issued a subpoena to Charter Communications for the subscriber information for that IP address for the date and time of the login. Charter Communications responded indicating the IP address returned to **Aaron Doty** residing at 1607 26<sup>th</sup> St NW #1, Canton, Ohio 44709.
13. On March 13, 2020, **Aaron Doty** (User ID 187800927) and *d.beas22* (User ID 257324731) both logged onto the internet within 13 minutes of each other at Malone University in Canton, Ohio from IP address 70.63.30.202. A check of the Malone University website revealed that **William Aaron Doty Jr**, also known as **Aaron Doty**, is a current employee at the University.
14. On June 17, 2020, affiant issued an administrative subpoena to Malone University to determine who was assigned the IP address on March 13, 2020, when both *d.beas22* and **Aaron Doty** logged on to Instagram. On June 22, 2020, Malone University responded to the subpoena and indicated that **William Aaron Doty** logged into the Malone University system on the date and times named.

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<sup>2</sup> A cookie is a piece of text that a Web server can store on a user's hard disk. Cookies allow a Web site to store information on a user's machine and later retrieve it. The pieces of information are stored as name-value pairs. For example, a Web site might generate a unique ID number for each visitor and store the ID number on each user's machine using a cookie file.

15. On May 27, 2020, affiant served Instagram with a preservation request pursuant to 18 U.S.C. § 2703(f), requiring Instagram to preserve all information associated with the account *d.beas22* (User ID 257324731).
16. On June 24, 2020, a federal search warrant was served upon Instagram via the Facebook legal portal for the records of the account identified as "*d.beas22*". Affiant received the information requested in the Instagram search warrant the same day.
17. Upon reviewing the records, affiant verified the information contained in the original CyberTip from Instagram to NCMEC as discussed above.
18. Affiant was also able to verify the conversation that took place with Minor Victim #2, however the video files were not contained in the search warrant results. Affiant reviewed the search warrant results and located the following additional chat by **DOTY**:
19. On March 1, 2020, *d.beas22* communicated with Instagram user "*Minor #5*" at which time the following conversation took place:

*d.beas22*: Cuties

*Minor #5*: Thx

*d.beas22*: Ur only 12 tho? Thats ok i like younger girls

*Minor #5*: Really !?!

*d.beas22*: Yeah for sure

*Minor #5*: Ok cool

*d.beas22*: I like [N.C.] [redacted] and she is only 12

*Minor #5*: Ok

*Minor #5:* Lol

*d.beas22:* Do u ever play with urself?

*Minor #5:* No

*d.beas22:* You should

*Minor #5:* Why

*d.beas22:* I love when girls do i

*d.beas22:* And it feels amazing btw

*Minor #5:* Nah im good

*d.beas22:* Sorry for asking

*Minor #5:* Nah its all good

*d. beas22:* I do think you would like it

*Minor #5:* Umm im not sure

*d.beas22:* Ive talked to a bunch of girls about it and they all love it

*Minor #5:* Ok then

*Minor #5:* Cool

*d.beas22:* Have u ever done nudies

*Minor #5:* no

*d.beas22:* Would you

*Minor #5:* Probably not

20. On July 10, 2020, a subpoena was issued to Facebook to obtain the login IP addresses of **DOTY'S** account for June 8, 2020 to July 8, 2020 in an effort to verify his current location. On July 13, 2020, Facebook responded and the results

indicated there were “no responsive records located” for those dates, meaning **DOTY** did not log into his Facebook account during that month.

21. On July 14, 2020, affiant was able to identify and locate Minor Victim #2, the subject of the chats and videos described above. Affiant confirmed that Minor Victim #2 is an 11 year old female residing in Ohio.

22. On July 15, 2020, a forensic interview was conducted with Minor Victim #2, at which time she confirmed she had sent the sexually explicit videos discussed above, via Instagram, to an individual known to her as “Davin”.

23. Minor Victim #2 stated she began conversing with “Davin” on a mobile application known as *Likee* in approximately October or November of 2019. She was then advised by “Davin” to switch to Instagram, which she did.

24. Minor Victim #2 also stated she sent several sexually explicit images/videos on Instagram during that time to “Davin” (identified as **DOTY**). The last ones were sent in February or March of 2020 prior to blocking “Davin” on Instagram.

25. On July 21, 2020, Affiant executed a search warrant at **William A. Doty’s** residence located in the Northern District of Ohio, Eastern Division. **DOTY** was located at his residence at the time of warrant execution.

26. **DOTY** was advised by Affiant, in the presence of FBI SA Timothy Alvord, that he was not under arrest and did not have to speak with Affiant.

27. **DOTY** stated he wanted to speak at which time Affiant made a recording of the interview.


28. **DOTY** stated that he had been using Instagram for 2-4 years for the purposes of having young girls, age 8 and up, send him “naked” images and videos.



29. **DOTY** confirmed that he used the name “Davin” but could not recall his username until it was provided to him by Affiant.
30. **DOTY** stated he is currently using “Snapchat” and “Likee” to contact underage girls for images and videos.
31. **DOTY** stated he also sent images and videos of “Davin” which would be child sex abuse material which include penis pictures.
32. **DOTY** recalled Minor Victim #2 as being 11 years old and asking her for nude videos which involved the use of a hair brush.
33. Affiant also observed a video in the “gallery” section of **DOTY’S** phone which depicts an unknown subject inserting fingers into the vagina of a nude prepubescent female.

### **CONCLUSION**

34. Based on the foregoing, your affiant respectfully submits that there is probable cause to believe that **William A. Doty Jr.** violated 18 U.S.C. § 2251(a), sexual exploitation of children; and 18 U.S.C. §2252(a), receipt and distribution of visual depictions of real minors engaged in sexually explicit conduct. Your affiant, therefore, respectfully requests that the court authorize the Complaint and arrest warrant for **William Aaron Doty Jr.**

A handwritten signature in blue ink, appearing to read "B. Allen", is written above a horizontal line.

Bryan J. Allen  
TFO Federal Bureau of Investigation

Sworn to via telephone after submission by reliable electronic means [Fed. R. Crim. P.4.1] on this 21st day of July 2020.



A handwritten signature in black ink that reads "Kathleen B. Burke". The signature is written in a cursive, flowing style.

Kathleen B. Burke, U.S. Magistrate Judge